

REMARKS/ARGUMENTS

Amendments

Before this Amendment, claims 1-41 and 43-45 were present for examination. Claim 1, 15, 29, and 43-45 are amended. No other claims are added or canceled. Therefore, claims 1-41 and 43-45 are present for examination, and claims 1, 15, and 29 are the independent claims. No new matter is added by these amendments, as support for the amendments may be found in the Specification (Original Application, p. 15, ll. 22-30; p. 17, ll. 10-31; p. 20, ll. 22-31; Fig. 1C). Applicants respectfully request reconsideration of this application as amended.

The Final Office Action dated September 25, 2006 ("Office Action") rejected claims 1-41 and 43-45 under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement. The Office Action also rejected claims 1-41 and 43-45 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Patent No. WO/01/19005 A1 ("WO Rabenko") in view of the cited portions of U.S. Publication No. 2002/0129154 to Okawa, et al. ("Okawa") and further in view of the cited portions of U.S. Patent No. 6,580,710 to Bowen et al. ("Bowen"). The Examiner, however, states that cited portions of U.S. Patent 6,819,682 to Rabenko et al. ("Rabenko") are identical to the reference, and the Rabenko column and line number are used for ease of reference. Applicants will also refer to Rabenko in this Amendment.

35 U.S.C. §112, First Paragraph

The Office Action rejected the pending claims under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. This ground of rejection was first raised in the Office Action dated May 6, 2006, apparently objecting to the first and second signals in the different digital video formats.

Applicants respectfully submit that these elements are amply supported in the Specification (*See* Amendment dated July 27, 2006). However, in the interest of moving the

Application forward, with this amendment Applicants modify the claims to remove the limitation that forms the basis of the §112 rejection, without prejudice or disclaimer.

35 U.S.C. §103(a), Rabenko, Okawa, Bowen

The Office Action rejected independent claims 1, 15, and 29 under 35 U.S.C. §103(a) as being unpatentable over Rabenko in view of Okawa, and further in view of Bowen. To establish a *prima facie* case of obviousness, the prior art references must “teach or suggest all the claim limitations.” MPEP § 2143. Applicants believe significant limitations from the independent claims are neither taught nor suggested in the references.

Specifically, none of the cited references can be relied upon to teach or suggest a single network interface device 1) with separate interfaces to remotely located control points of two different telecommunication service providers, wherein 2) the network interface device receives sets of configuration instructions from each remote control point and provides only those services as allowed in the configuration instructions, as generally recited in amended claims 1, 15, and 29. Support for the amendments may be found in the Specification (Original Application, p. 15, ll. 22-30; p. 17, ll. 10-31; p. 20, ll. 22-31; Fig. 1C).

In light of the foregoing, Applicants respectfully submit that the specified limitations in independent claims 1, 15, and 29 are allowable for at least the foregoing reasons. Claims 2-14, 16-28, 30-41 and 43-45 each depend from these independent claims, and are believed allowable for at least the same reasons as given above. Applicants respectfully request that the rejection be withdrawn.

CONCLUSION


In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

Appl. No. 10/715,878
Amdt. dated December 4, 2006
Amendment under 37 CFR 1.116 Expedited Procedure
Examining Group 2615

PATENT

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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